



1.0 INTRODUCTION

This document describes a **Regional Mobile Business Outreach and Education Program** to be collaboratively conducted by the Copermittees of NPDES Order No. R9-2007-0001 (Permit). It was developed by the Mobile Business Subcommittee of the Copermittees' Outreach Workgroup. Permit section D.3.b.(4)(a) requires that each Copermittee develop and implement a program to reduce the discharge of pollutants from mobile businesses to the MEP. Section D.3.b.(4)(b) further states "if they choose to, the Copermittees may cooperate in developing and implementing their programs for mobile businesses, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education." Because mobile businesses inherently provide services at offsite locations crossing jurisdictional lines, the Copermittees have chosen to collaborate on a regional mobile business outreach and education strategy. It addresses the following elements:

- Inventory Development and Maintenance;
- Establishment of Minimum BMP Requirements; and
- Outreach and Education (Including Business Notifications)

Compliance and enforcement responsibilities for mobile businesses will continue to reside with individual jurisdictions, and are therefore not addressed as shared regional tasks under this Strategy.

2.0 SOURCE CHARACTERIZATION

Mobile businesses provide services at offsite locations rather than from fixed bases of operation. Services may be provided at, but are not limited to, residential, industrial, municipal, and commercial areas. Permit Section D.3.b.(1), identifies 12 categories of mobile business types that will be addressed as part of this regional Strategy. Table 1 identifies these businesses types and the potential pollutants associated with each. Additional characterization and description of these sources will be conducted during the development and implementation of the regional program elements described in Section 2.0

Table 1 – Identification of Mobile Business Types and Associated Pollutants-of-Concern

Source Type	Bacteria	Metals	Pesticides	Sediment	Trash	Nutrients	Organics	Oil/Grease
1. Auto Repair, Maintenance, Fueling, Cleaning		X		X	X		X	X
2. Equipment repair, maintenance, fueling, or cleaning		X		X	X		X	X
3. Mobile automobile or other vehicle washing		X		X	X		X	X
4. Pest control services		X	X				X	
5. Mobile carpet, drape or furniture cleaning							X	
6. Cement mixing or cutting				X		X	X	
7. Masonry				X		X	X	
8. Painting and coating		X			X		X	
9. Landscaping	X	X	X	X		X	X	
10. Pool and fountain cleaning		X		X		X	X	
11. Portable sanitary services	X				X	X	X	
12. Power washing services	X	X	X	X	X	X	X	X

3.0 REGIONAL PROGRAM ELEMENTS

The Regional Mobile Business Outreach and Education Program will consist of several elements to be developed and implemented by June 2010.

3.1 Inventory Development and Maintenance

Permit section D.3.b.(1) requires that each Copermittee keep as part of its commercial sources inventory a listing of mobile businesses known to operate within its jurisdiction, and section D.3.b.(4)(b) encourages Copermittees to share these inventories. In addition to sharing inventory information, the Copermittees have determined that the collaborative development of a shared regional inventory would promote consistency in the regulation of mobile businesses, and would promote cost-efficiency by eliminating redundancy between individual inventories and avoiding duplicative notifications. The Copermittees intend to utilize a consultant to compile this inventory. It is expected to be completed by June 2009.

Prior to the completion of a shared inventory, the City of Carlsbad will continue to meet the requirements of section D.3.b.(4)(b) by individually maintaining and updating as necessary the existing jurisdictional mobile business inventories. These will be used as a starting point for the development of a consolidated inventory. The consultant will also be tasked with researching other information sources such as unlicensed mobile businesses operating within the County, as well as with managing updates to the inventory in subsequent years.

3.2 Establishment of Minimum BMP Requirements

Permit section D.3.b.(4)(a)i requires that Copermittees develop and implement minimum standards and BMPs to be required for each of the various types of mobile businesses. The Copermittees also intend to collaborate in the development of a minimum set of BMP standards for each type of mobile business addressed through the regional effort. Existing resources such as jurisdictional minimum BMPs, the Project Clean Water Clean Water Tool Box (<http://www.projectcleanwater.org/bmp/>) and the Think Blue website

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(<http://www.sandiego.gov/thinkblue>) will be reviewed by the Copermittees in developing these common standards. A consultant may also be utilized for BMP development support. This task is expected to be completed by June 2009. All BMPs required for stationary sources, listed in Section 7.2.3.1 of the JURMP Update, are also required for mobile business where applicable. The most important BMPs for most mobile businesses typically involve non-storm water discharge control, and spill prevention, control, and cleanup.

3.3 Outreach and Education Strategy

Permit section D.3.b.(4)(a)iv requires that Copermittees develop and implement an outreach and education strategy for mobile businesses. A variety of educational methods and approaches will likely be utilized in complying with this requirement. These will be determined by the Copermittees during the development of this task. The centerpiece of the Copermittees' education strategy will be business notifications. This element is described further below.

3.4 Business Notifications

Permit section D.3.b.(4)(a)iii requires that, within the first three years of implementation of the updated JURMP, each Copermittee must notify the owner/operator of each inventoried mobile business their minimum standards and BMP requirements and local ordinances. The Copermittees will collaboratively develop and implement a regional notification strategy to inform mobile businesses of their obligation to comply with the local ordinances of the jurisdictions where they operate. In addition to assisting in the development of this strategy, the consultant will be tasked with notifying businesses and tracking when and how they were notified. Potential notification options include mailing, emailing, workshops, and website posting. This task will be completed no later than March 24, 2011, but is targeted for completion by March 2010.

3.5 Implementation Schedule

Implementation of the Regional Mobile Business Outreach and Education Program will begin during FY 08/09, with all major tasks targeted for completion by the end of FY 2009/10. The consultant may also be retained for future management of the inventory and other tasks as needed. Major milestones are summarized below.

FY 2008/09

- Consultant selection by Subcommittee
- Completion and maintenance of regional inventory by consultant
- Development of regional minimum BMPs

FY 2009/10

- Notification of businesses by consultant (by January 2010)
- Final report including status of notifications submitted to Copermittees

4.0 INDIVIDUAL COPERMITTEE RESPONSIBILITIES

Although many of the specific requirements of Permit section D.3.b.(4)(a) will be collaboratively addressed through the completion and implementation of the Regional Mobile Business Outreach and Education Program, the responsibility for ensuring individual Permit compliance

ultimately remains with each Copermittee. The City of Carlsbad's responsibilities are briefly discussed below.

4.1 Inspections and Enforcement

The primary focus of mobile business inspections is on discharge control BMPs. Inspections will primarily use off-site evaluation methods such as reviews and telephone contacts, as described in Section 7.2.2, to determine the status and location of mobile businesses. Site evaluations and inspections of mobile businesses will generally be initiated by complaints and/or visual observations by City staff. The inspections will follow the same procedures described in 7.2.4 of this JURMP. The enforcement actions for mobile business activities are similar to the City's general enforcement as described in Section 2.

Regardless of where the activity occurs, the City categorically prohibits illegal discharges from mobile businesses. Aside from washing, cleaning, or other activities that may cause illegal discharges, mobile businesses are not likely to conduct activities that produce significant pollutant discharges. If in the future the City finds that even in the absence of illegal discharges the activities of mobile businesses are contributing pollutants of concern to a CWA section 303(d) impaired waterbody segments or are negatively impacting ESAs, additional controls will be required for those activities. Further, if the City has reason to believe that mobile businesses are generating significant illegal discharges in a given area of the City that is tributary to a 303(d) listed waterbody (and the discharges contain pollutants causing the impairment) or is within, directly adjacent to, or directly discharges to a waterbody within an ESA, City staff may more regularly visit those areas and/or take other actions to address the illegal discharges.

4.2 Education and Outreach

In addition to supporting and participating in Regional outreach and education efforts for mobile businesses, the City will continue to distribute and develop outreach materials for mobile business types and activities. In addition, during and following offsite and onsite mobile business inspections, the City will provide information about minimum BMPs, the storm water pollution prevention requirements, and other relevant educational materials. Information about the City's and regional requirements will also be made available on the City's webpage.

4.3 Inventory Updates

Because of the unique nature of mobile business (move around frequently, rarely have business licenses or permits, etc.) it is not expected that a complete inventory of mobile businesses in Carlsbad will be achieved. Rather, the City will maintain an inventory (the basis of inspections lists and priorities) of known mobile businesses and also partner with regional efforts to develop and maintain a region-wide inventory of mobile businesses. Information for inventory updates will be generated from complaints, observations by City staff, and available business licenses. Information for inventory updates will be generated from complaints, observations by City staff, and available business licenses.

4.4 BMP Requirements

The City will work with the Copermittees to make jurisdictional BMPs and requirements available as requested during the development of regional standards and program content. The Regional Mobile Business Outreach and Education Program will emphasize standardized,

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common content. In the event that the City determines that specific requirements are not adequately addressed by the Regional Program, the City will develop and distribute additional notifications or other needed measures, as necessary.